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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 24, 1997

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Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Comments of Soundview Technologies
Technical Requirements to Enable Blocking of Video Programming
Based on Program Rating (ET Docket No. 97-206)

Dear Mr. Caton:

By its undersigned attorney, Soundview Technologies ("Soundview") hereby submits for filing its comments in the above-captioned rulemaking. This submission consists of a facsimile version of the comments as signed by Soundview, plus nine complete copies. The original-signature version of the document will be filed shortly.

Please date-stamp the attached duplicate upon receipt and return it via the messenger for our records. If any questions arise concerning this matter, kindly contact the undersigned.

Respectfully submitted,


Rosemary C. Harold

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Technical Requirements to Enable Blocking
of Video Programming based on Program Ratings)

ET Docket No. 97-206

Implementation of Sections 551 (c), (d), and (e) of
the Telecommunications Act of 1996)

**COMMENTS OF SOUNDVIEW
TECHNOLOGIES INCORPORATED**

Soundview Technologies Incorporated, a division of Anasia Research Corporation, hereby submits comments in response to the above-captioned Notice of Proposed Rule making. In the Notice, the Commission has solicited comments on its proposal to implement the program-blocking requirements contained in Sections 551 (c), (d) and (e) of the Telecommunications Act.

I. Introduction

Soundview Technologies Incorporated has developed the V Chip Converter™, a set-top unit, which will enable the approximately 200 million existing televisions in American homes which would otherwise be "deaf" to the v-chip signals, to utilize v-chip technology. Soundview plans to have its converter on the market within a few months after the adoption of a technical standard for v-chip implementation.

II. It is imperative to quickly adopt a rating system and technical standard so that the American public can benefit from V-chip technology.

For every day that there is a delay in the adoption of a rating system and technical standard there is another day that parents are denied v-chip blocking technology to help shield their children from the ever increasing amounts of potentially harmful material entering their households. The Commission should remember that the entire purpose of this legislation is for the protection of our

...with the... interest of American families. Soundview

Technologies, and others, have expressed their intentions to have V-chip technology available within a few months after the adoption of a rating system and technical standard.

III. A single rating system will allow for the most effective blocking technology.

It is critical that blocking technology is immune to tampering with by those whom it is designed to protect, namely children. Once a parent has made a decision to block program material that he or she deems unacceptable, that material should only be available for viewing with use of a parent controlled lock-out mechanism, such as a personal identification number (PIN). Due to other material currently present on line 21 of the vertical blanking interval, such as closed captioning, the Electronics Industries Association has suggested that program rating data be broadcast at a minimum of every three seconds. If multiple rating systems are implemented, this latency period will grow such that a patient child, toggling between channels, will be able to defeat the system. At three seconds, Soundview's trials have shown that this is not a problem, however as this time period grows, the V-chip blocking system quickly becomes ineffective.


IV. The Commission's Approval of a simple rating system will increase the use of V-chip blocking technology.

Soundview has developed its Converter box as the ratings dialogue has evolved. We have watched our box grow more complex as rating systems have grown in complexity. Our research indicates that as more icons and additional rating systems are added, programming procedures become more complex and time consuming; hence consumers are less prone to program the device and ultimately use the technology for blocking objectionable programming.

V. Conclusion

Soundview believes that the Commission should act in a manner such that American families can benefit to the fullest extent from V-chip blocking technology as soon as possible. Every day delayed is another day of exposure of objectionable programming to millions of our country's youth. A parent friendly, easy to operate, secure system will ensure maximum use of this important new technology.

Respectfully submitted,


H. Lee Browne, President
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